

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

GOLI NUTRITION INC., *et al.*,<sup>1</sup>

Debtors in a Foreign Proceeding.

x

: Chapter 15

: Case No. 24-10438 (LSS)

: Jointly Administered

x

**NOTICE OF AGENDA FOR HEARING SCHEDULED FOR APRIL 15, 2024 AT  
12:00 P.M. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN AT  
824 N. MARKET STREET, WILMINGTON, DE 19801, 6<sup>TH</sup> FLOOR, COURTROOM 2**

This hearing will be conducted in-person, any exceptions must be approved by chambers. Parties may observe the hearing remotely by registering with the Zoom link below no later than April 12, 2024 at 4:00 p.m.

To attend a hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov).

\*The deadline to register for remote attendance is 4 PM (prevailing Eastern Time) the business day before the hearing unless otherwise noticed.\*

After the deadline has passed and electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.

**RESOLVED MATTER**

1. Motion of Petitioner for Entry of an Order (A) Authorizing the Petitioner to File that Certain Subscription Agreement and Agency Agreement Under Seal and (B) Granting Related Relief [D.I. 9, filed on March 19, 2024]

Objection Deadline: April 8, 2024

Related Documents:

- A. Notice of (I) Motion and (II) Filing of (A) Redacted Subscription Agreement and (B) Redacted Agency Agreement [D.I. 45, Filed April 1, 2024]

<sup>1</sup> The Debtors in these Chapter 15 cases, are: Goli Nutrition, Inc., a company incorporated in Québec, Canada and the last 4 digits of its Canadian business number is 0002; and Goli Nutrition Inc., a company incorporated in Delaware and the last 4 digits of its federal tax identification number is 2655. The Debtors are collectively managed from their corporate headquarters which are located at 2205 Boul. De la Côte-Vertu, suite 200, Montreal, Québec, Canada.

- B. Notice of Withdrawal [D.I. 49, Filed April 3, 2024]
- C. Notice of Filing of Unredacted (A) Subscription Agreement and (B) Agency Agreement [D.I. 50, Filed April 3, 2024]

Responses: None.

Status: Petitioner no longer seeks authority to seal the Subscription Agreement or the Agency Agreement.

## **MATTERS GOING FORWARD**

- 2. Petitioner's Verified Petition Under Chapter 15 for Recognition of the Canadian Proceedings and Request for Related Relief [D.I. 2, Filed on March 19, 2024]

Objection Deadline: April 8, 2024, extended to April 11, 2024 for Sharon and Odelya Hoffman, RGL Holdings, RGL Management LLC, Saddle Ranch APG LLC.

Related Document:

- A. Notice of (I) Filing of (A) Petitions Pursuant to Chapter 15 of the Bankruptcy Code and (B) Petitioner's Sale Motion; (II) Entry of Provisional Relief Order; (III) Deadline to Object to Entry of Recognition Order and Sale Order; and (IV) Hearing for Court to Consider Chapter 15 Petitions, Sale Motion, Entry of Recognition Order and Sale Order [D.I. 39, Filed March 25, 2024]

Responses:

- B. Objection to (A) Petitioner's Verified Petition Under Chapter 15 for Recognition of the Canadian Proceedings and Request for Related Relief and (B) Petitioner's Motion for Entry of an Order (I) Recognizing and Enforcing the RVO and the Atos Sale Order, (II) Approving the Sale Transactions Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief [D.I. 55, filed April 11, 2024]

Status: This matter will go forward.

- 3. [SEALED] Petitioner's Motion for Entry of an Order (I) Recognizing and Enforcing the RVO and Atos Sale Order, (II) Approving the Sale Transactions Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief [D.I. 7, filed on March 19, 2024]

Objection Deadline: April 8, 2024, extended to April 11, 2024 for Sharon and Odelya Hoffman, RGL Holdings, RGL Management LLC, Saddle Ranch APG LLC.

Related Documents:

- A. [REDACTED] Petitioner's Motion for Entry of an Order (I) Recognizing and Enforcing the RVO and Atos Sale Order, (II) Approving the Sale Transactions Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief [D.I. 8, Filed March 19, 2024]
- B. Notice of (I) Filing of (A) Petitions Pursuant to Chapter 15 of the Bankruptcy Code and (B) Petitioner's Sale Motion; (II) Entry of Provisional Relief Order; (III) Deadline to Object to Entry of Recognition Order and Sale Order; and (IV) Hearing for Court to Consider Chapter 15 Petitions, Sale Motion, Entry of Recognition Order and Sale Order [D.I. 39, Filed March 25, 2024]
- C. Notice of (I) Motion and (II) Filing of (A) Redacted Subscription Agreement and (B) Redacted Agency Agreement [D.I. 45, Filed April 1, 2024]
- D. Notice of Fiing of (I) Proposed Approval and Reverse Vesting Order, and (II) Proposed Liquidation Order [D.I. 46, Filed April 1, 2024]
- E. Notice of Filing of Unredacted (A) Subscription Agreement and (B) Agency Agreement [D.I. 50, Filed April 3, 2024]
- F. Petitioner's Supplement in Support of Motion for Entry of an Order (I) Recognizing and Enforcing the RVO and the Atos Sale Order, (II) Approving the Sale Transactions Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief [D.I. 53, filed April 11, 2024]
- G. Supplemental Declaration of Noah Zucker in Support of (A) Petitioner's Verified Petition Under Chapter 15 for Recognition of the Canadian Proceedings and Request for Related Relief, (B) Motion for Provisional Relief, and (C) Motion for Order Enforcing CCAA Vesting Orders [D.I. 56, filed April 11, 2024]

Responses:

- H. Saddle Ranch APG LLC's Response to Petitioner's Motion for Entry of an Order (I) Recognizing and Enforcing the RVO and the Atos Sale Order, (II) Approving the Sale Transactions Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief [D.I. 54, filed April 11, 2024]
- I. Objection to (A) Petitioner's Verified Petition Under Chapter 15 for Recognition of the Canadian Proceedings and Request for Related Relief and (B) Petitioner's Motion for Entry of an Order (I) Recognizing and Enforcing the RVO and the Atos Sale Order, (II) Approving the Sale Transactions Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief [D.I. 55, filed April 11, 2024]

Status: This matter will go forward.

Dated: April 11, 2024  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

---

Matthew B. McGuire (No. 4366)  
Matthew R. Pierce (No. 5946)  
Joshua B. Brooks (No. 6765)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
Email: mcguire@lrclaw.com  
pierce@lrclaw.com  
brooks@lrclaw.com

-and-

**NORTON ROSE FULBRIGHT US LLP**

Andrew Rosenblatt (admitted *pro hac vice*)  
Francisco Vazquez (admitted *pro hac vice*)  
Michael Berthiaume (admitted *pro hac vice*)  
1301 Avenue of the Americas  
New York, New York 10019  
Telephone: (212) 408-5100  
Facsimile: (212) 541-5369  
Email: andrew.rosenblatt@nortonrosefulbright.com  
francisco.vazquez@nortonrosefulbright.com  
michael.berthiaume@nortonrosefulbright.com

*Counsel to the Petitioner*